

EXHIBIT L

BERTHA HENDERSON; January 30, 2019

1

1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF WASHINGTON
3

4 STATE OF WASHINGTON,)
5 PLAINTIFF,) NO. 3:17-CV-05806-RJB
6 VS.)
7 THE GEO GROUP, INC.,)
8 DEFENDANT.)
9)
10)

11
12 DEPOSITION UPON ORAL EXAMINATION OF
13 BERTHA HENDERSON
14

15 10:08 A.M.

16 JANUARY 30, 2019

17 800 FIFTH AVENUE, SUITE 2000

18 SEATTLE, WASHINGTON
19



24 REPORTED BY: BETSY E. DECATER, RPR, CCR 3109
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BERTHA HENDERSON; January 30, 2019

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1 SEATTLE, WASHINGTON; JANUARY 30, 2019

2 10:08 A.M.

3 --oOo--

4
5 BERTHA HENDERSON,

6 sworn as a witness by the Certified Court Reporter,

7 testified as follows:

8
9 EXAMINATION

10 BY MS. BRENNEKE:

11 Q. So before we start the inquiry today, I just want
12 to put on the record that counsel for defendants,
13 Michael Pusateri, and we have a couple of things we just
14 want to let you know and make sure you understand, which
15 is we've had two depositions in this case and we already
16 have deposition exhibits up to No. 25. So we may ask
17 you to look at those, and then we're going to start any
18 exhibits today at 26 and we'll do it as continuing
19 exhibits in an effort of reduce redundancy and waste.

20 A. Okay.

21 Q. And then the second thing is that in this case
22 there's a protective order entered that's intended to
23 protect confidential documents and records, and GEO has
24 identified a number of records as confidential. In
25 order to show them to people, we have been asked and we



1 have agreed to have people sign an exhibit that says you
2 will also maintain confidentiality. Instead of doing
3 that now, your counsel has said he'll go over that with
4 you and make sure you're honoring those agreements and
5 that's enough for us.

6 But I just want to let you know that some of the
7 stuff we're talking about is confidential and you
8 wouldn't want to talk about it outside of the deposition
9 in that sense.

10 A. Yeah.

11 MS. BRENNEKE: Are we good?

12 MR. PUSATERI: We are.

13 Q. (BY MS. BRENNEKE) So now let's go on to you.

14 A. All right.

15 Q. My name is Andrea Brenneke, and I represent the
16 State of Washington as one the assistant attorney
17 generals.

18 MS. CHIEN: I'm Marsha Chien. I'm also one of
19 the attorneys.

20 MS. BAKER: La Rond Baker also an assistant
21 attorney general.

22 Q. (BY MS. BRENNEKE) So we all represent -- I mean,
23 we're all working together as a team. I'll be doing
24 most of the questioning today. We're just taking turns.

25 A. Okay.



1 Q. So could you please state your name and spell it?

2 A. Bertha Henderson, B-e-r-t-h-a, H-e-n-d-e-r-s-o-n.

3 Q. And do you also go by a nickname?

4 A. Bert, B-e-r-t, yes.

5 Q. And is it okay if I call you Ms. Henderson?

6 A. That's fine.

7 Q. So what is your address?

8 A. 9014 Wildwood Avenue SW, Lakewood, Washington
9 98498.

10 Q. What is your current employer and position?

11 A. Northwest Detention Center, and I'm the food
12 service manager.

13 Q. And is Northwest Detention Center a corporation,
14 private corporation owned and operated by GEO?

15 A. GEO.

16 Q. So GEO is your actual employer?

17 A. Yes, correct.

18 Q. And Northwest Detention Center is your location?

19 A. Location, correct.

20 Q. Have you ever had your deposition taken before?

21 A. No.

22 Q. Okay. So let me just explain a little bit about
23 what this is. This is our opportunity to ask you
24 questions and to learn what you know.

25 A. Okay.



1 if you wanted a different opportunity?

2 A. Yes.

3 Q. Did you receive any training for your food
4 service manager position when you were hired?

5 A. With GEO?

6 Q. Yes.

7 A. Yes. We went through a six-week academy.

8 Q. At a corporate location?

9 A. The location was in Tacoma.

10 Q. And who produced -- I'm sorry, who conducted the
11 training?

12 A. It would have been the training director.

13 Q. Was it one-on-one training or --

14 A. No. It was a group.

15 Q. So other food service managers also were there
16 from other facilities?

17 A. No. When we were hired, there was six of us in
18 the academy and they were my -- the cooks and cooks that
19 were in the academy, and we went through that training
20 for six weeks before we actually started at GEO at the
21 facility.

22 Q. So it was you and other kitchen staff in the GEO
23 facility?

24 A. Yes.

25 Q. At Northwest Detention Center?



1 gets a certain portion of each part of the meal,
2 correct?

3 A. Correct. According to the menu, yes.

4 Q. And then all of that goes onto a cart that is
5 then brought into the pods; is that right?

6 A. That's correct. We satellite feed.

7 Q. So people are actually eating in their
8 residential areas in their dining spaces?

9 A. Correct. We don't have a chow hall, so we call
10 it satellite feeding.

11 Q. Satellite feeding?

12 A. Yes.

13 Q. Okay. Did the GEO staff have to work longer
14 hours in order to compensate for the detainee worker
15 drop in numbers?

16 A. They're already working a ten-hour shift. Most
17 of my cooks work ten-hour shifts and two work eight-hour
18 shifts.

19 Q. Did you ask them to work overtime or extra time
20 during that -- during this period when the detainee
21 workforce has been lower?

22 A. Well, with the overlap, it's covered. So there's
23 always that overlap there. So, again, they work two
24 tens and then an eight hour, and then also there's my
25 supervisor that's also there.



REPORTER'S CERTIFICATE

I, BETSY E. DECATER, the undersigned Certified Court Reporter, pursuant to RCW 5.28.010 authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify that the sworn testimony and/or proceedings, a transcript of which is attached, was given before me at the time and place stated therein; that any and/or all witness(es) were duly sworn to testify to the truth; that the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability; that the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring at the time and place stated in the transcript; that a review of which was waived; that I am in no way related to any party to the matter, nor to any counsel, nor do I have any financial interest in the event of the cause.

WITNESS MY HAND and DIGITAL SIGNATURE this 11th day of February, 2019.



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